

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**Brandi Didier, as Next Friend to  
H.G.H., a Minor Child,**

**Plaintiff,**

**v.**

**FCA US LLC,**

**Defendant.**

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**Civil Action No. 4:18-cv-98**

**JURY DEMAND**

**DECLARATION OF PAUL G. PLANTINGA**

1. My name is Paul G. Plantinga. I have never been convicted of a crime involving moral turpitude, am over the age of eighteen, of sound mind, and am competent to make this Declaration. I have personal knowledge of the factual matters set forth herein.

2. I am currently employed by FCA US LLC ("FCA US") as Senior Specialist. I was employed in the same position during the month of December of 2017. Part of my job duties include receiving and reviewing documents related to product claims and lawsuits.

3. For purposes of investigating Brandi Didier's claims which are the subject of this lawsuit, FCA US generated Warranty and Owner Reports, from Vehicle Information Plus, for the particular vehicle at issue in this case (VIN 2C8GT64L53R129681). The information generated into Vehicle Information Plus is prepared by people with knowledge of the information described and is entered at or near the time of the events/information described. It is in FCA US' regular course of business to create and maintain the information contained in the Report.

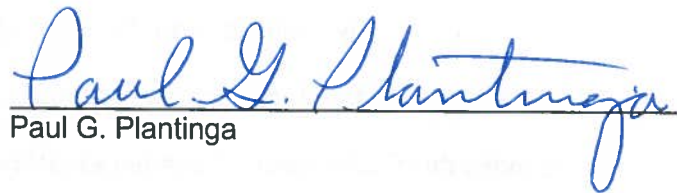
**EXHIBIT 2**

4. A true and correct copy of the Warranty and Owner Vehicle Information Plus Reports are attached to this declaration as Exhibit A.

5. As documented in Exhibit A, the subject vehicle was sold at retail (In-Service Date) on October 11, 2002. FCA US's predecessor's involvement in the initial distribution of the vehicle to an authorized dealership for sale to the public was therefore completed by October 11, 2002 at the latest, and FCA US did not sell or distribute the vehicle after that date.

I declare, under penalty of perjury that the foregoing is true and correct.

Executed on this 20TH day of SEPTEMBER 2018.

  
Paul G. Plantinga

<b>VIN:</b> *	<input type="text" value="2C8GT64L53R129681"/> (Enter Last Eight of VIN)	<b>Part Number:</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<b>Odometer:</b> *	<input type="text" value="1"/>	<b>LOP:</b>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<b>Customer Name:</b>	<input type="text"/> (First Four of Last)	<b>History:</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No (Yes: All, No: Two years is default)		

\* - Required Field

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**VIN:** 2C8GT64L53R129681    **In Service Date:** October 11, 2002    **Year/Model:** 2003 CHRYSLER TOWN COUNTRY LTD AWD LWB W

**Odometer:** 1 miles    **Currency:** USD    **WCC Code:** 770    [Summary Preview](#)    [Page Preview](#)

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 [Options](#) | 
 [Owner](#) | 
 [CAIR](#) | 
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**STRICTLY CONFIDENTIAL:** This information is provided to DEALER, in accordance with Section 4 of DEALER's Software License, Data Exchange and Electronic Commerce Agreement with FCA US LLC. All information provided is based on entries provided by DEALER.

### Vehicle Owner Information

<b>Name:</b>	<input type="text"/>	<b>Preferred Name:</b>	<input type="text"/>
<b>Address:</b>	<input type="text"/>	<b>City:</b>	<input type="text"/>
<b>State/Province:</b>	<input type="text"/>	<b>Postal Code:</b>	<input type="text"/>
<b>Country:</b>	<input type="text"/>	<b>Language Preference:</b>	<input type="text"/>
<b>Telephone-Home:</b>	<input type="text"/>	<b>Telephone-Business:</b>	<input type="text"/>
<b>Fax:</b>	<input type="text"/>	<b>Original Owner:</b>	<input type="text"/>

**EXHIBIT A**

VIN: \* 2C8GT64L53R129681 (Enter Last Eight of VIN)

Odometer: \* 1

Customer Name: (First Four of Last)

Part Number:

LOP:

History: ☐ Yes ☒ No (Yes: All, No: Two years is default)

\* - Required Field

Submit

Clear

Quick LOP

VIN: 2C8GT64L53R129681

In Service Date: October 11, 2002

Year/Model: 2003 CHRYSLER TOWN COUNTRY LTD AWD LWB W

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[All Coverages](#) | [Recall](#) | [Warranty](#) | [Service Contract](#) | [LOP Coverage](#) | [PLX](#)

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Warranty Coverage				
Warranty Warning Messages				
Warnings				
REFER TO SPECIFIC LOPS FOR ADDITIONAL COVERAGE AND LIMITS				
* \$100 DEDUCTIBLE BEYOND 3/36 BASIC TRANSFERS: ALL OWNERS NO CHARGE **2004 MY VEHICLES BUILT PRIOR TO 10/1/03(EXCLUDES DURANGO)				
BASED ON TIME AND MILEAGE ENTERED - NO WARRANTY TOWING COVERAGE IS AVAILABLE.				
Warranty Information				
Type of Warranty	Original	Deductible	Expiration	Remaining
BASIC WARRANTY	36 Months or 36,000 miles	0	October 11, 2005	Expired (Time)
POWERTRAIN WARRANTY	84 Months or 70,000 miles	100	October 11, 2009	Expired (Time)
CORROSION WARRANTY	60 Months or 100,000 miles	0	October 11, 2007	Expired (Time)
FEDERAL EMISSIONS WARRANTY	36 Months or 36,000 miles	0	October 11, 2005	Expired (Time)
ADJUSTMENT WARRANTY	36 Months or 36,000 miles	0	October 11, 2005	Expired (Time)
MAJOR EMISSION COMP WARRANTY	96 Months or 80,000 miles	0	October 11, 2010	Expired (Time)
(X20) XT WARR A/C COMPRESSOR	84 Months or 70,000 miles	0	October 11, 2009	Expired (Time)
Warranty Additional Information				
WCC Code	Roadside Assistance	Towing Assistance	Master Shield	Transferable-Powertrain Warranty
770	No	No	N/A	No